

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

JOHN HANCOCK LIFE INSURANCE
COMPANY, JOHN HANCOCK VARIABLE
LIFE INSURANCE COMPANY and
MANULIFE INSURANCE COMPANY,

Plaintiffs,

v.

ABBOTT LABORATORIES,

Defendant.

CIVIL ACTION NO. 05-11150-DPW

JOINT MOTION TO MODIFY SCHEDULING ORDER

Plaintiffs John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and ManuLife Insurance Company (f/k/a Investors Partner Life Insurance Company) (collectively, "John Hancock") and defendant Abbott Laboratories ("Abbott") (collectively, the "Parties") hereby move, pursuant to Local Rule 16.1(G), to modify the Scheduling Order issued by the Court on October 13, 2005 (the "Original Scheduling Order"). Grounds for this joint motion are as follows:

1. The Parties have been endeavoring to meet the deadlines established by the Original Scheduling Order. Thus far, they have been able to resolve many discovery disputes through negotiation and without resort to motion practice. Document production, however, has taken considerably longer than expected. John Hancock completed its production of 1,051 pages of

documents, per the agreement of the parties, on February 28, 2006. Abbott stated that it required additional time, at least three additional weeks, to complete its production of over 50 boxes of paper documents and more than 167,000 pages (approximately 66 boxes) of electronic documents in response to John Hancock's First Request for Production, served on October 7, 2005. John Hancock, in turn, currently expects that it will require approximately 3 to 4 weeks to process and complete its review of the large volume of documents that Abbott expects to produce.

2. As a result of the current production schedule and the substantial time needed by John Hancock to process and review Abbott's documents, the Parties jointly propose extending the various deadlines in the existing case schedule by approximately 70 days (with some adjustment for end-of-year holidays) as follows:

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
All discovery completed	August 25, 2006	November 1, 2006
Exchange expert proffer	May 5, 2006	July 14, 2006
Expert reports completed	June 1, 2006	August 8, 2006
Rebuttal experts	July 7, 2006	September 15, 2006
Dispositive motions submitted	September 29, 2006	December 7, 2006
Responses to dispositive motions	October 26, 2006	January 10, 2007
Replies to responses	November 18, 2006	February 1, 2007

WHEREFORE, the parties jointly and respectfully request that the Court grant this Joint Motion to Modify the Scheduling Order for the reasons stated above.

ABBOTT LABORATORIES

JOHN HANCOCK LIFE INSURANCE
COMPANY, JOHN HANCOCK VARIABLE
LIFE INSURANCE COMPANY and
MANULIFE INSURANCE COMPANY

By its attorneys,

By their attorneys,

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Date: March 29, 2006

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and that paper copies will be sent to those non-registered participants (if any) on March 29, 2006.

/s/ Stacy Blasberg

Stacy L. Blasberg